

JET/RLW: Feb. 2020
GJ#15

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

| | | |
|---------------------------------|---|-------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CASE NO. |
| |) | |
| WILLIAM PARK WINSTON |) | FILED UNDER SEAL |

INDICTMENT

COUNT ONE

[18 U.S.C. §§ 2251(a) and (e)]

The Grand Jury charges that:

Between on or about December 1, 2018 and July 12, 2019, a more exact date being unknown to the Grand Jury, in Madison County, within the Northern District of Alabama, the defendant,

WILLIAM PARK WINSTON,

did knowingly attempt to and did employ, use, persuade, induce, entice, and coerce a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been

mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO
[18 U.S.C. §§ 2423(b) and (e)]

The Grand Jury charges that:

On or about June 19, 2019, in Madison County, within the Northern District of Alabama, the defendant,

WILLIAM PARK WINSTON,

did travel in interstate commerce, to wit: from Georgia to Alabama, for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with a person who had not attained the age of 16 years, in violation of Title 18, United States Code, Section 2423(b) and (e).

COUNT THREE
[18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)]

The Grand Jury charges that:

On or about June 19, 2019, in Madison County, within the Northern District of Alabama, the defendant,

WILLIAM PARK WINSTON,

did knowingly possess a computer, computer disk, and any other material that contains an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

COUNT FOUR
[18 U.S.C. § 1470]

The Grand Jury charges that:

Between on or about December 1, 2018 and July 12, 2019, in Madison County, within the Northern District of Alabama, and elsewhere, the defendant,

WILLIAM PARK WINSTON,

did knowingly transfer, by means of a facility of interstate commerce, obscene matter to K.G., who had not attained the age of 16 years, knowing that K.G. had not attained the age of 16 years, in violation of Title 18, United States Code, Section 1470.

NOTICE OF FORFEITURE
[18 U.S.C. § 2253(a)]

As a result of the foregoing offenses alleged in **COUNTS ONE** through **FOUR** of this Indictment, the defendant,

WILLIAM PARK WINSTON,

shall forfeit to the United States the following:

- A. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, computer disk, thumb drive, flash drive, or other matter that contains any such visual depiction, which was produced, transported, mailed, shipped, and received in violation of Chapter 110 of the United States Code;
- B. any property, real or personal, used and intended to be used to commit and to promote the commission of such offenses, including but not limited to the following: (1) Samsung Galaxy S6 edge; and
- C. any proceeds or gross profits of the offenses, or any property traceable thereto.

If any property subject to forfeiture pursuant to Title 18, United States Code, Section 2253(a), as a result of any act or omission of the defendant,

WILLIAM PARK WINSTON,

- 1) cannot be located upon the exercise of due diligence;
- 2) has been transferred or sold to, or deposited with, a third person;
- 3) has been placed beyond the jurisdiction of the Court;
- 4) has been substantially diminished in value; or

5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL

/s/ Electronic Signature

FOREPERSON OF THE GRAND JURY

JAY E. TOWN
United States Attorney

/s/ Electronic Signature

R. LEANN WHITE
Assistant United States Attorney